IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re application of:	
Devendra Karla	Examiner: Thomas E. Shortledge
Serial No: 09/707,309	
Filed: June 11, 2002	Art Unit: 2626
For: TEXT CREATING AND EDITING SYSTEM AND METHOD WITH DYNAMIC DATA LOADING	

TRANSMITTAL OF APPEAL BRIEF

Mail Stop Appeal Brief- Patents
Commissioner for Patents
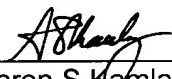P.O. Box 1450
Alexandria, Virginia 22313-1450

ATTENTION: Board of Patent Appeals and Interferences

Sir:

Attached hereto is Appellants' Brief for the above-referenced application. The Commissioner is authorized to charge the requisite fee of $500.00 (37 C.F.R. § 1.17(c)) and all other fees associated with this submission, to Deposit Account No. 11-0600.

Respectfully submitted,

Date: March 20, 2007

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APPEAL BRIEF UNDER 37 CFR 41.37

Mail Stop **Appeal Brief- Patents**
Commissioner for Patents
P.O. Box 1450
Alexandria, Virginia 22313-1450

ATTENTION: Board of Patent Appeals and Interferences

Sir:

Appellants submit this Appeal Brief in the above-referenced application. A Notice of Appeal was filed on November 20, 2006.

REAL PARTY IN INTEREST

VeriSign, Inc. is the real party in interest for all issues related to this application by virtue of assignments filed with the USPTO and recorded at reel 014354, frame 0073.

RELATED APPEALS OR INTERFERENCES

There are no other appeals, interferences, or judicial proceedings known to Appellants, Appellants' legal representative, or assignee which may be related to, directly affect or be directly affected by or have a bearing on the Board's decision in the pending appeal.

STATUS OF CLAIMS

This application contains claims 1-8 and 18-28. Claims 1-3, 18-22 and 28 stand finally rejected as anticipated over prior art and claims 4-8 and 23-27 stand finally rejected as obvious over prior art. Claims 9-17 have been canceled.

STATUS OF AMENDMENTS

An after-final amendment was filed on January 22, 2007, canceling claims 9-17. The February 15, 2007 Advisory Action indicates that for purposes of appeal the claim amendments will be entered.

SUMMARY OF CLAIMED SUBJECT MATTER

Independent claim 1 recites a method of creating a document on a computing device, comprising: initializing (300, p. 8, lines 14-16, Figs. 3 and 4) the computing device (100, p. 6 line 1, Figs. 1 and 2) with a portion of font data (502, Fig. 5, p. 10, lines 8-14) for a particular language (500, Fig. 5, p. 10 lines 5-8), the portion including less than all of the font data for the particular language (300, 502, Figs. 3 and 5, p. 10, lines 8-9, p. 10 line 22 – p. 11 line 2), receiving input text in the computing device (302, Fig. 3, p. 8 lines 21-22) to initiate the document creation process (304, Figs. 3 and 4, p. 8 lines 22-23), based on the input text, determining whether the portion of the font data is sufficient to create the document on the computing device (306, Figs. 3 and 4, p. 9 lines 1-5), and loading a further portion of the font data to the computing device (310, Figs. 3 and 4, p. 9 lines 5-7) from a data storage location (102, Fig. 1, p. 6 ,lines 16-18), if the computing device cannot create the document with the portion of the font data (310, Figs. 3 and 4, p. 9 lines 5-7), wherein the further portion of the font data alone or in combination with the portion of the font data are used to create the document (308, Figs. 3 and 4, p. 9 lines 8-11).

Independent claim 18 recites a method of creating an electronic document on a computing device, comprising: receiving input text in the computing device (302, Figs. 3 and 4, p.8 lines 21-22); based on the input text, determining whether the computing device has a portion of font data for a particular language stored therein to create the document(306, Figs. 3 and 4, p. 8 line 23 – p. 9 line 5), the portion including less than all of the font data for the.

particular language (306, Figs. 3 and 4, 502, Fig. 5, p. 9 lines 3-8) and if so, creating the document for displaying the input text (308, Figs. 3 and 4, p. 9 lines 8-11); downloading a further portion of the font data from a data storage location when the computing device does not have the font data stored therein to create the document (310, Figs. 3 and 4, p. 9 lines 5-8); and creating the document using at least the further portion of the font data (308, Figs. 3 and 4, p.9 lines 8-11), wherein the document allows for the display of the input text (308 and 302, Figs. 3 and 4, p. 10 lines 17-19).

Independent claim 28 recites a method of creating a document on a computing device comprising: receiving input text in the computing device to initiate the document creation process (302-304, Figs. 3 and 4, p. 8 lines 21-23); based on the input text, determining whether a portion of font data for a particular language (306, Figs. 3 and 4, 502-504, Fig. 5, p. 9 lines 1-3, p. 10 lines 5-9), to create the document on the computing device is loaded (306, Figs. 3 and 4, p. 9 lines 3-8), wherein displaying the document includes displaying the input text (308, Figs. 3 and 4, p. 9 lines 8-10); and loading a further portion of the font data to the computing device from a data storage location (310, Figs. 3 and 4, p. 9 lines 5-7) if the computing device cannot create the document with the portion of the font data (310, Figs. 3 and 4, p. 9 lines 5-7), wherein the further portion of the font data alone or in combination with the portion of the font data are used to create the document (308, Figs. 3 and 4, p. 9 lines 8-11), wherein the document allows for the display of the input text (308 and 302, Figs. 3 and 4, p. 10 lines 17-19).

GROUNDS OF REJECTION TO BE REVIEWED

The Final Rejection rejects claims1-3, 18-22 and 28 under 35 U.S.C. §102(e) over U.S. Patent Number 6,073,148 to Rowe et al. ("Rowe") and rejects claims 4-8 and 23-27 under 35 U.S.C. §103(a) over Rowe in view of U.S. Patent Number 6,623,529 to Lakritz ("Lakritz").

ARGUMENT

The Final Rejection fails to demonstrate that any of the pending claims are anticipated. Details of these arguments are presented below.

The Claims are Not Anticipated

Claim 1 recites, *inter alia*, initializing the computing device with a portion of font data for a particular language, the portion including less than all of the font data for the particular language; and loading a further portion of the font data to the computing device from a data storage location if the computing device cannot create the document with the portion of the font data, wherein the further portion of the font data alone or in combination with the portion of the font data are used to create the document.

Claim 18 recites, *inter alia*, determining whether the computing device has a portion of font data for a particular language stored therein to create the document, the portion including less than all of the font data for the particular language, and downloading a further portion of the font data from a data storage location when the computing device does not have the font data stored therein to create the document.

Claim 28 recites, *inter alia,* determining whether a portion of font data for a particular language, to create the document on the computing device is loaded, wherein displaying the document includes displaying the input text; and loading a further portion of the font data to the computing device from a data storage location if the computing device cannot create the document with the portion of the font data, wherein the further portion of the font data alone or in combination with the portion of the font data are used to create the document, wherein the document allows for the display of the input text.

None of the applied reference disclose or suggest these features and therefore the references do not anticipate or render obvious the claims of the application.

In particular, the references do not disclose or suggest initializing the computing device with a portion of font data for a particular language, the portion including less than all of the font data for the particular language. The references also fail to disclose or suggest loading a further portion of the font data to the computing device from a data storage location if the computing device cannot create the document with the portion of the font data, wherein the further portion of the font data alone or in combination with the portion of the font data are used to create the document. The Office Action refers to Rowe at col. 28, lines 7-13 as supposedly disclosing this subject matter. However, this portion of Rowe only indicates:

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"When a font reference is encountered, step 400, the software must determine whether the desired font is already available to it, step 402. This would be the case, for example, if the font had already been stored in a cache (for example, in step 247, illustrated in FIG. 10) or stored on a local data store, such as a hard disc drive 28 (illustrated in FIG. 1). If the font is available, step 404, naturally the software would use it.

"On the other hand, step 406, if the desired font is not available, the software downloads a substitute font."

This does not disclose "initializing the computing device with a portion of font data for a particular language, the portion including less than all of the font data for the particular language" as required by claim 1 and similarly in claims 18 and 28. There is no disclosure of initializing a computing device with a portion of a font data for a particular language, the portion including less than all of the font data for the particular language. Rowe does not disclose the concept of utilizing a portion but less than all of the font data for a particular language.

Further, the Office Action asserts that Rowe discloses loading a further portion of the font data to the computing device from a data storage location if the computing device cannot create the document with the portion of the font data at col. 28, lines 5-10 and 55-60. Rowe discloses that a desired font can be downloaded, but does not disclose loading a further portion of the font data if the computing device cannot create the document with the portion of the font data. Rowe has not disclosure of portions of font data, initializing with a portion of font data including less than all of the font data of a particular language, or loading the further portion of the font data as claimed. As such, Rowe does not anticipate claims 1-3, 18-22 and 28 and reversal of the rejection is requested.

For at least these reasons, it is submitted that claims 1-3, 18-22 and 28 and all claims dependent therefrom, are not anticipated by Rowe. Reversal of the rejection is requested.

The Claims are Not Obvious

Lakritz does not solve the deficiencies of Rowe regarding the above noted claims, from which claims 4-8 and 23-27 depend. Accordingly, none of these claims are obvious and reversal of the rejection is requested.

CONCLUSION

Appellant respectfully requests reversal of the rejections of claims 1-8 and 18-28. These claims are allowable over the cited art.

Respectfully submitted,

Date: March 20, 2007

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CLAIMS APPENDIX

1.   A method of creating a document on a computing device, comprising:

initializing the computing device with a portion of font data for a particular language, the portion including less than all of the font data for the particular language;

receiving input text in the computing device to initiate the document creation process;

based on the input text, determining whether the portion of the font data is sufficient to create the document on the computing device; and

loading a further portion of the font data to the computing device from a data storage location if the computing device cannot create the document with the portion of the font data, wherein the further portion of the font data alone or in combination with the portion of the font data are used to create the document.

2.   A method according to claim 1 further comprising discarding undesired data from the computing device after creating the document.

3.   A method according to claim 1 further comprising dynamically loading the further portion of the font data during the text inputting step.

4.   A method according to claim 1 further comprising inputting text in a first language and loading the further portion of the font data that corresponds to a second language.

5.   A method according to claim 4 further comprising displaying the document on a monitor in the second language.

6.   A method according to claim 4, wherein the first language comprises a Roman language and the second language comprises a non-Roman language.

7.   A method according to claim 4, wherein the first language comprises a non-Roman language and the second language comprises a Roman language.

8.   A method according to claim 4, wherein the first language comprises English and the second language comprises non-English.

9-17.   (Canceled)

18.   A method of creating an electronic document on a computing device, comprising:

receiving input text in the computing device;

based on the input text, determining whether the computing device has a portion of font data for a particular language stored therein to create the document, the portion including less than all of the font data for the particular language and if so, creating the document for displaying the input text;

downloading a further portion of the font data from a data storage location when the computing device does not have the font data stored therein to create the document; and

creating the document using at least the further portion of the font data, wherein the document allows for the display of the input text.

19.   A method according to claim 18, wherein the downloading the further portion of the font data is performed in a sequential manner.

20.   A method according to claim 18, wherein the downloading the further portion of the font data is performed in a periodical manner.

21.   A method according to claim 18 further comprising discarding undesired data form the computing device after creating the document.

22.   A method according to claim 18 further comprising dynamically downloading the further portion of the font data during the text inputting step.

23.   A method according to claim 18 further comprising inputting text using a first language and downloading the further portion of the font data that corresponds to a second language.

24.   A method according to claim 23 further comprising displaying the document on a monitor in the second language.

25.   A method according to claim 23, wherein the first language comprises a Roman language and the second language non-Roman language.

26.   A method according to claim 23, wherein the first language comprises a non-Roman language and the second language Roman language.

27.   A method according to claim 23, wherein the first language comprises English and the second language comprises non-English.

28.   A method of creating a document on a computing device comprising:

receiving input text in the computing device to initiate the document creation process;

based on the input text, determining whether a portion of font data for a particular language, to create the document on the computing device is loaded, wherein displaying the document includes displaying the input text; and

loading a further portion of the font data to the computing device from a data storage location if the computing device cannot create the document with the portion of the font data, wherein the further portion of the font data alone or in combination with the portion of the font data are used to create the document, wherein the document allows for the display of the input text.

EVIDENCE APPENDIX

No evidence under 37 CFR 1.130, 1.131 or 1.132 was submitted in this application.

RELATED APPEALS APPENDIX

There are no other appeals, interferences, or judicial proceedings known to Appellants, appellants' legal representative, or assignee which may be related to, directly affect or be directly affected by or have a bearing on the Board's decision in the pending appeal.